

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.

Plaintiff,

vs.

LM ERICSSON TELEPHONE COMPANY
(TELEFONAKTIEBOLAGET LM ERICSSON)

Case No. 2:11-cv-4574-RK

QUALCOMM, INC.

ALCATEL-LUCENT USA INC.

and

THIRD GENERATION PARTNERSHIP
PROJECT A/K/A 3GPP

Defendants.

**DEFENDANT QUALCOMM INC.'S MOTION TO COMPEL
PLAINTIFF TRUEPOSITION, INC. TO ANSWER
CERTAIN INTERROGATORIES**

Defendant Qualcomm Inc. hereby moves the Court to compel plaintiff TruePosition, Inc. to give full, specific, and non-evasive answers to certain of Qualcomm's interrogatories pursuant to Federal Rules of Civil Procedure 37(a)(3)(B)(iii). The grounds for this Motion are set forth in the accompanying Memorandum of Law and the Declaration of Benjamin H. Diessel, with Exhibits.

Date: January 6, 2014

Respectfully submitted,

/s/ Robert N. Feltoon

Robert N. Feltoon
CONRAD OBRIEN PC
1500 Market Street
West Tower - Suite 3900
Philadelphia, PA 19102
(215) 864-8064

Roger G. Brooks
Yonatan Even
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
(212) 474-1000

Counsel for Qualcomm Incorporated